## UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF TENNESSEE MEMPHIS DIVISION

In Re: Case No. 19-23834

KOJETTA FLYNN BENNETT,

Chapter 13

DEBTOR(S).

# OBJECTION OF WELLS FARGO BANK, N.A. TO CONFIRMATION REGARDING REAL PROPERTY LOCATED AT 4565 BERRYPICK LN SOUTH, MEMPHIS, TENNESSEE 38141

**COMES NOW** Wells Fargo Bank, N.A., for just cause, and files this written objection to confirmation pursuant to 11 USC § 1324. Wells Fargo Bank, N.A. objects and asks that a hearing be held and for grounds says that the arrearage listed in the plan is too low (plan provides for \$15,460.00, whereas actual arrears are approximately \$19,359.94); and that the Debtor has been involved in the following prior unsuccessful bankruptcy cases:

- 1. Case no. 14-32260; Filed 12/04/14, Dismissed 08/21/15
- 2. Case no. 15-28192; Filed 09/01/15, Dismissed 07/18/16
- 3. Case no. 16-27323; Filed 08/12/16, Dismissed 10/13/16
- 4. Case no. 16-29733; Filed 10/21/16, Dismissed 08/17/18

## WHEREFORE, PREMISES CONSIDERED, Creditor prays:

- 1. That confirmation be denied.
- 2. That Wells Fargo Bank, N.A. be awarded its attorney fees and costs incurred in this action.
- 3. For any and all further relief to which it may be entitled.

## Respectfully submitted,

/s/ Jordan Anderson

Jordan Anderson, Attorney for Creditor, Bar # 036721 joranderson@logs.com |704-609-3496 Shapiro & Ingle, LLP 10130 Perimeter Pkwy, Suite 400 Charlotte, NC 28216

Phone: 704-333-8107 | Fax: 704-333-8156 Supervisory Attorney Contact: Bonnie Culp

bculp@logs.com | 704-249-0065

Electronic Service Notifications: tnecf@logs.com

### CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Objection to Confirmation has been electronically served or mailed, postage prepaid on July 18, 2019

Jimmy E. McElroy 3780 S. Mendenhall Memphis, TN 38115

Kojetta Bennett aka Kojetta Flynn Bennett 4565 South Berrypick Lane Memphis, TN 38141

Sylvia F. Brown 200 Jefferson Ave. Suite #1113 Memphis, TN 38103

#### /s/ Jordan Anderson

Jordan Anderson, Attorney for Creditor, Bar # 036721 joranderson@logs.com |704-609-3496 Shapiro & Ingle, LLP 10130 Perimeter Pkwy, Suite 400 Charlotte, NC 28216 Phone: 704-333-8107 | Fax: 704-333-8156

Supervisory Attorney Contact: Bonnie Culp

bculp@logs.com | 704-249-0065

Electronic Service Notifications: tnecf@logs.com